

Exhibit 16

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS

ANTHONY ZARA,

Plaintiff,

v.

DEVRY EDUCATION GROUP, INC.;
DEVRY MEDICAL INTERNATIONAL,
INC.; ROSS UNIVERSITY SCHOOL OF
MEDICINE, SCHOOL OF VETERINARY
MEDICINE (ST. KITTS) LIMITED; and
ALEXA FERRARI;

Defendants.

Civil Action No. 1:16-cv-5156

Honorable Judge Andrea R. Wood
Magistrate Judge Sidney Schenkier

**DECLARATION OF ANTHONY ZARA IN SUPPORT OF
PLAINTIFF'S OPPOSITION TO MOTION TO DISMISS PLAINTIFF'S CLAIMS
AGAINST DEFENDANTS DEVRY EDUCATION GROUP INC., DEVRY MEDICAL
INTERNATIONAL, INC., AND ROSS UNIVERSITY SCHOOL OF MEDICINE,
SCHOOL OF VETERINARY MEDICINE (ST. KITTS) LIMITED**

I, Anthony Zara, being first duly sworn, according to the law, depose and say:

1. I am over the age of 18, mentally competent, have personal knowledge of the facts in this affidavit, except where stated upon information and belief, and if called upon to testify as to the statements made herein, I could and would do so.

2. I am the Plaintiff in the above referenced matter, filed with the United States District Court for the Northern District of Illinois and submit this declaration in support of Plaintiff's Opposition to Motion to Dismiss Plaintiff's Claims against Defendants DeVry Education Group, Inc., DeVry Medical International, Inc., and Ross University School of Medicine School of Veterinary Medicine (St. Kitts) Limited.

3. At my recruiting meeting with Ross University School of Medicine, School of Veterinary Medicine (St. Kitts) Limited (“RUSVM”), I was told explicitly by RUSVM that, “this is a U.S. school that happens to have its campus on a beautiful island.”

4. I was also given recruiting booklet stating that DeVry handles all of the administrative issues at the school.

5. When I was applying to RUSVM, I sent all my application materials to DeVry Medical International, Inc.’s (“DMI”) New Jersey office, as directed, and received my acceptance letter from a U.S. address.

6. Since the time my problems with local St. Kitts RUSVM administration began, Illinois DeVry Education Group, Inc. (“DVG”) employees, John Kroen and Steven Riehs, have maintained active involvement in emails related to my expulsion.

7. I believed I was going to a United States-based veterinary school because RUSVM is a United States school providing academic instruction at its campus on the island of St. Kitts.

I declare under the penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Execute this 22nd day of June, 2016.

/s/ Anthony Zara
ANTHONY ZARA